

# Preparing the Waste with No Disposal Path Approval Package

Los Alamos National Laboratory  
Laboratory Implementation Guidance LIG 404-00-05.0  
Issue Date: June 15, 2001

Non-Mandatory

## 1.0 Introduction

### 1.1 Overview

The Los Alamos National Laboratory (Laboratory) requires that generators of waste with no disposal path prepare an approval request package prior to the generation of this waste. ([LIR 404-00-02](#))

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## 2.0 Purpose

This document provides guidance to waste generators on the completion of the waste with no disposal path approval request package.

## 3.0 Scope & Applicability

This guidance is recommended for use by all Laboratory waste generators who may generate a waste with no disposal path.

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## 4.0 Definitions

***Waste with no disposal path*** – A waste stream with no identified treatment or disposal path. Examples of wastes with no disposal path include:

- Non-defense transuranic or mixed transuranic waste
  - High tritium-contaminated mixed waste
  - Compressed gas cylinders with radioactive contamination
  - Explosives with radioactive contamination
  - High mercury waste (greater than 260 parts per million)
  - PCB waste with RCRA and radioactive constituents
  - Dioxin waste
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## 5.0 Precautions and Limitations

This document only covers guidance on completing the initial request for approval and does not provide guidance on the annual update required by DOE . ([LIR 404-00-02](#)). As required by LIR 404-00-02, the annual update shall be submitted to DOE on October 1 of each year. The required text for the annual update is in LIR 404-00-02.

Because there may be storage time limits for waste with no disposal path, it is important to identify this waste and begin the approval process. In accordance with the requirements of [LIR 404-00-05](#), radioactive waste may not be stored longer than 1 year. [LIR 404-00-03](#) contains the storage requirements for waste with no disposal path that meets the definition of a hazardous waste.

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## 6.0 Guidance

When completing the approval request package, the generator should consider the following the recommendations prevent delay of the package.

- Identify the program that funds the project or process that will generated the waste (e.g., DP-10, DP-20, Energy Research) and the sponsor program/project manager's name.
- Identify the Laboratory contact , phone number, and organization

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- Describe the process that generates the waste and its location including Technical Area, building, and any other appropriate location information. For waste that is found or is from a spill clean up include the storage location.
  - Indicate whether this is a current functioning process or a proposed process. If it is a proposed process include the scheduled start-up date.
  - Identify the waste that cannot be disposed of and the projected annual and life-cycle volume for this waste.
  - Identify and summarize the relevant portions of the NEPA document(s) which will address this operations and the generation and disposition of this waste, if applicable
  - Identify and summarize the documents that comprise the authorization basis or authorization agreements for this facility and this operation, if applicable.
  - Explain the waste characteristics and issues that prevents treatment/disposal of the waste. Examples of characteristics and issues include
    - It is non-defense transuranic waste
    - There is no licensed disposal facility
    - The waste requires treatment before disposal and there is no treatment facility available.
  - Describe the activities and inquiries that have been made to determine if a treatment/disposal path is available.
  - Provide copies of pollution prevent opportunity assessments other waste minimization/pollution prevention studies performed for the waste stream and the process that creates it.
  - Indicate whether this waste is being addressed by national efforts to provide treatment and disposal options (e.g., Mixed Low-Level Waste Center for Excellence national procurements)
  - Estimate the life-cycle costs for storage and maintenance of the waste.
  - Estimate the ultimate disposal costs if possible.

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- Include a commitment from the generating program to support the above costs until the waste is ultimately disposed of. These costs may include the cost for additional sampling and analysis.
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## 7.0 Documentation

[LIR 404-00-02](#), “General Waste Management Requirements,” contains the requirements for general waste record keeping and documentation requirements that apply to all waste types.

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## 8.0 REFERENCES

### 8.1 Document Ownership

The Waste Management Policy and Procedure Council shall be the OIC for this document.

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### 8.2 Referrals

The Associate Laboratory Director for Nuclear Weapons – Materials and Manufacturing Office, 7-9113 or [nopath@lanl.gov](mailto:nopath@lanl.gov)  
Radioactive Liquid Waste Treatment Facility, 7-4301  
Facility and Waste Operations–Solid Waste Operations (FWO-SWO), 5-6158  
WIPP Certification (E-ET), 7-8532  
Hazardous and Solid Waste (ESH-19), 5-0677

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